EXHIBIT B

Will Routt

From:	Will Routt
Sent:	Wednesday, June 19, 2019 5:49 PM
To:	Horton, Odell; Brown, Byron
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Subject:	Turnage, et al. v. Oldham, et al., Case No. 2:16-cv-02907-SHM-tmp
Attachments:	ESI Protocol Search Terms (revised).docx

Odell and Byron-

Please find attached Plaintiffs' proposed search terms for culling down the County's 292,697 ESI documents. The attached search terms result in 168,563 documents (including family members) and accordingly eliminate 124,134 documents from the universe of 292,697 documents provided by the County. Plaintiffs believe that such a significant reduction relieves the County of any alleged burden with respect to producing this ESI and would ask that the County produce these documents with Bates labels at its earliest convenience pursuant to the Court's order. Plaintiffs encourage the County to forego any document-by-document privilege/confidentiality review of these materials in reliance upon the robust protective order and clawback provisions that the Court has entered in this case, particularly since Plaintiffs already have access to these documents. In light of the protective order and clawback provisions, such a production cannot harm the County and will facilitate our mutual efforts to mediate later this year.

I am in the process of working with the vendor to get the control numbers for the 168,026 documents that Plaintiffs have identified and will provide that to you when it is available. In the meantime, we're happy to discuss.

Thanks,

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(1983 OR Alameda OR Apolog OR Appearance OR Arraign OR *Arrest* OR Authorize* OR Aware OR Back-up OR Bartel OR Bed OR Booking OR Bond OR Breach OR Break OR broken OR Brophy OR Budget OR Bug OR Bump* OR Butler OR Cameron OR "case management" OR Cause OR Class OR Comfort OR Common OR Compatible OR Compensat* OR Complain* OR Complicat* OR Concerns OR Condition OR Constitution OR Convict* OR Cooper OR Correct OR Critical OR Crowd OR Crucial OR Cullison OR Custody OR Custom OR Cycle OR Damn OR Days OR Debacle OR Defect* OR Delay OR Demo* OR Depart OR Depriv* OR Detain* OR Detention OR Determin* OR Dim OR Disaster OR Dismiss OR dispose OR Docket OR Dormitory OR Down OR Duplicate OR Ector OR Essential OR Example OR Fail* OR Fault OR Fiasco OR Fix OR Flaw OR Flow OR Food OR Format OR Frequent* OR Fuck OR Function OR Funny OR Future OR "Global Tel*Link" OR Golive OR Gross OR *@gtl.net OR Guard OR Hand OR Harass OR Hell OR Holding OR Hours OR Implement* OR Imprison OR IMS OR Incarcerat* OR Identical OR Imperative OR Impossible OR Indifference OR Inhumane OR Investigate OR "jail support specialist" OR "jail population management" OR Jefferson OR JMS OR Johnsey OR JSS OR JSSI OR Judge OR Justif* OR Kiosk OR Languish OR Lawsuit OR Liberty OR Linger OR Litigation OR Live OR lost OR Magnitude OR Major OR Manual* OR Merced OR Mess OR Money OR Negligen* OR News OR Nugent OR Odessa OR Overcrowd OR Over-detain OR Over-populat* OR Paramount OR Patch OR Policy OR Population OR Post OR Pre-set OR Press OR Prisoner OR Priority OR Probable OR Problem OR Puckett OR Re-arrest OR Ready OR Release OR Replac* OR Resolve OR Responsible OR Restore OR Rights OR "roll out" OR Serious OR Shit OR Sierra-cedar OR *@sierrasystems.com OR Significant OR Skahan OR software-AG OR Spence OR storm OR stuck OR surprise OR terminate OR terrible OR Thompson OR trouble OR Tyler OR *@tylertech.com OR Unacceptable OR Unbelievable OR Unlawful OR Urgent OR violation OR vital OR warning OR warrant OR wrong OR Zigler) % "exchange ID" % "root transmission"